

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA
Case No.: 1:25-CV-00209

STARBURST DATA, INC.,

PLAINTIFF,

v.

JOSHUA ROBERT HEWITT,

DEFENDANT.

DECLARATION OF
ZECHARIAH C. ETHERIDGE

I, Zechariah C. Etheridge, declare under penalty of perjury as follows:

1. I am over the age of eighteen (18) and am otherwise competent to make the statements contained in this declaration.
2. I submit this declaration in support of defendant Joshua Robert Hewitt's motion to dismiss pursuant to Fed. R. Civ. P. 12(b)(1) and 12(b)(6).
3. In April 2025, Mr. Hewitt provided my office with an Excel sheet containing the corresponding serial nos. to the eleven laptops returned to Starburst Data, Inc. in November 2024. *See Exhibit A.*
4. At various times between May 2025 and June 20, 2025, I searched the serial nos. of the eleven laptops on Apple.com to learn additional information about the value of the laptops; I also performed searches using

everymac.com, a website unaffiliated with Apple.com that enables users to search serial nos. of Apple products. *See Exhibit B.*

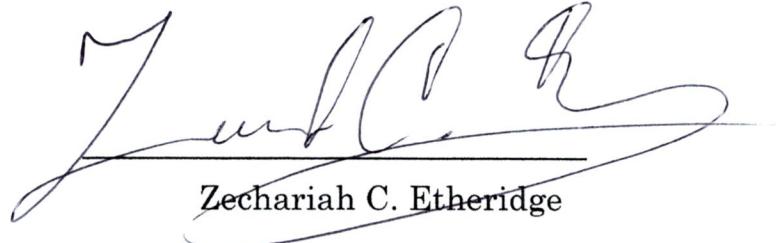
5. Using the year, model, and screen size information obtained from Apple.com and everymac.com; I then performed searches on swappa.com, a product resale website that provides estimates of used technology-related products such as cell phones, computers, watches, tablets, game consoles, cameras and audio devices.

6. Searches performed on swappa.com between May and June of 2025 demonstrated secondary market values of \$257 - \$443 for certain MacBook Air models and values of \$721 - \$1,173. for certain MacBook Pro models similar to those returned by Mr. Hewitt, which valuations represent a majority of the year and model of the returned MacBooks. *See Exhibit C.*

7. Such values may deviate from the value at the time of the events described in Starburst's complaint and may also deviate from the value of the laptops at the time of this declaration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Date: June 20, 2025



A handwritten signature in black ink, appearing to read "Zechariah C. Etheridge". The signature is fluid and cursive, with a long horizontal line extending from the end of the "e" in "Etheridge" towards the right.

Zechariah C. Etheridge